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Attorneys for defendant
Allegiant Travel Company

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KELLY CALZADA, individually and on
behalf of all others similarly situated,

Plaintiff

v.

ALLEGiant TRAVEL COMPANY,

Defendant.

Case No. 2:24-cv-01402-DJC-DB

Judge Daniel J. Calabretta

**JOINT STIPULATION TO EXTEND
TIME FOR DEFENDANT ALLEGiant
TRAVEL COMPANY TO RESPOND
TO COMPLAINT**

TO THE COURT, ALL PARTIES, AND ALL ATTORNEYS OF RECORD:

The Parties, by and through their undersigned counsel, hereby stipulate as follows:

1. WHEREAS, plaintiff Kelly Calzada filed her Complaint against defendant Allegiant Travel Company ("Allegiant") on or about May 16, 2024;

2. WHEREAS, Allegiant was served with the Summons and Complaint on or about May 21, 2024;

3. WHEREAS, Allegiant's current deadline to respond to the Complaint is June 11, 2024;

4. WHEREAS, the parties met and conferred regarding Allegiant's planned motion to dismiss the Complaint and potential settlement opportunities on June 6, 2024;

5. WHEREAS, the parties agreed to continue discussing these issues to potentially avoid the time and expense of briefing a motion to dismiss;

6. WHEREAS, Allegiant's counsel has scheduling conflicts on June 11, 2024 stemming from another case, as well as a previously scheduled personal vacation on that date;

7. WHEREAS, no trial date, pre-trial conference date, last date to hear motions, or discovery cutoff date has yet been scheduled in this case;

8. WHEREAS, there have been no prior requests for an extension of the deadline for Allegiant to file a responsive pleading;

9. WHEREAS, in an effort to conserve judicial resources and accommodate Allegiant's counsel's previously scheduled conflicts, the Parties have agreed to extend Allegiant's deadline to file its responsive pleading by 14 days.

NOW THEREFORE, based on the above-mentioned recitals, the Parties, through their undersigned counsel of record, stipulate and agree that Allegiant's responsive pleading deadline shall be extended, up to and including **June 25, 2024**.

A proposed order accompanies this stipulation.

1 IT IS SO STIPULATED.

2 I, Marie E. Christiansen, attest that all other signatories listed, and on whose behalf
3 the filing is submitted, concur in the filing's content and have authorized the filing.
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5 Dated: June 6, 2024

VEDDER PRICE (CA), LLP

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8 By: /s/ Marie E. Christiansen
Marie E. Christiansen

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10 *Attorneys for defendant*
Allegiant Travel Company

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12 Dated: June 6, 2024

BURSOR & FISHER, P.A.

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14 By: /s/ Sarah N. Westcot
Sarah N. Westcot

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16 *Attorneys for plaintiff Kelly Calzada*
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ORDER

Based on the Parties' Joint Stipulation, L.R. 144, and good cause appearing, the Court hereby orders that:

Allegiant Travel Company's deadline to respond to the Complaint is extended to and including June 25, 2024.

Dated: June 7, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2024, I caused to be electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF system and that all counsel of record will be served via the Notice of Electronic Filing generated by CM/ECF.

/s/ Marie E. Christiansen
Marie E. Christiansen